

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

**JUDITH WASS**, individually and on behalf of  
all others similarly situated,

Plaintiff,

vs

Case No. 6:13-CV-03267

**DOLGEN CORP, LLC**,

Defendant.

**PLAINTIFF'S AMENDED NOTICE OF DEPOSITION OF DEFENDANT'S  
CORPORATE REPRESENTATIVE**

**NOTICE IS HEREBY GIVEN** that on June 5, 2014 at 10:00 a.m. at Vowell & Jennings Court Reporters 214 2<sup>nd</sup> Ave. N, Suite 207 Nashville, TN 37201, Plaintiff, through counsel, will take the deposition of Defendant, by and through such officers, directors, managing agents or other persons as may be designated by said deponent to testify in its behalf. The deposition will be recorded by stenographic and video means. The video recording will be administered by an employee of Legal Services of Southwest Missouri.

The matters upon which such examination are requested and on which the deponent will be examined are:

1. The ATLAS systems handling of scheduling, meal break coverage, and the procedure for clocking in and out for meal breaks.
2. Defendant's time-keeping systems from May of 2010 to May of 2013 including how employees enter time, policies and procedures governing employees' entry of time, and how time entry information is used to pay employees.

3. Defendant's time-keeping systems in place between May 2010 and May 2013 that were used by employees to clock in and out of work including how employees record their time the use of the cash register, and any exceptions to the register as the mode for entering time.
4. Defendant's procedures and policies from May 31, 2010 to May 31, 2013 for when its employees took meal breaks; when non-salaried employees were required to clock out for meal breaks; when non-salaried employees were required to take meal breaks; and tasks that a clocked out non-salaried key holding employee could be expected to perform that would require the employee to stay on site for meal breaks.
5. Training received by key holders regarding meal breaks, including, but not limited to clocking in and out if required to perform tasks during a meal break and tasks that a key holding employee could be expected to perform that would require the employee to stay on site for meal breaks.
6. Compensation for non-salaried key holders who perform work related tasks during an on-site meal break.
7. Tasks that a clocked out non-salaried key holding employee could be expected to perform that would require the employee to stay on site for meal breaks.
8. Efforts taken by Dollar General during the last five years to prevent off the clock work during meal breaks.
9. Dollar General's complaint procedure in effect during the last five years to prevent off-the-clock work.
10. Efforts taken by Dollar General during the last five years to monitor and prevent off-the-clock work during meal breaks by keyholders.

If said deposition is not completed before 5:00 P.M. on said day, it shall be continued

from day to day thereafter, at the same place and between the same hours until completed. Such deposition is intended to be used for any lawful and proper purpose, including use at trial as evidence.

**DOUGLAS, HAUN & HEIDEMANN, P.C.**

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By /s/ Nathan A. Duncan

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Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that on May 27, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

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**DOUGLAS, HAUN & HEIDEMANN, P.C.**

/s/Nathan A. Duncan

By\_\_\_\_\_

**DHH No. 19455-002**